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FEDERAL COMMUNICATIONS COMMISSION
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Federal-State Joint Board on	)	CC Docket No. 96-45
Universal Service	)	

COMMENTS OF THE RURAL INDEPENDENT COMPETITIVE ALLIANCE

The Rural Independent Competitive Alliance ("RICA") files these comments in response to the Further Notice of Proposed Rule Making in this proceeding, FCC 01-8, released January 12, 2001 ("NPRM").[1] RICA is an alliance of Competitive Local Exchange Carriers ("CLECs") providing competitive service in rural areas of the United States. RICA members are generally affiliated with a rural incumbent local exchange carrier ("ILEC") and compete in adjacent markets in which the ILEC is a Bell Operating Company ("BOC") or affiliate of a large holding company.

These comments on the Recommended Decision of the Joint Board reiterate briefly RICA's comments of November 3, 2000 to the Joint Board regarding the Rural Task Force recommendation. RICA is simultaneously filing comments on the Notice of Proposed Rulemaking in CC Docket No. 00-256, FCC 00-448, released January 5, 2001 in regard to the proposal of the Multi-Association Group ("MAG NPRM"). Both comments will focus on the question of how the two proposals affect the means by which rural companies can bring improved service to long neglected rural areas.

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[1] *In the Matter of Federal-State Joint Board on Universal Service*, CC Docket 96-45, FCC 01-8 (rel. Jan. 12, 2001).

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List A B C D E

I RURAL CARRIERS HAVE SUBSTANTIALLY IMPROVED SERVICE IN AREAS LONG NEGLECTED BY LARGE CARRIERS

A. Purchase of Exchanges From Non-Rural Companies Has Been Successful, But Often Difficult and Expensive

RICA's Comments to the Joint Board emphasized the difference in the level and quality of service in rural areas, depending upon whether the incumbent LEC ("ILEC") is locally owned and operated or is a BOC or other large holding company.[2] Where rural ILECs have been able to purchase these rural exchanges, they have made significant improvements in the quality of service to the benefit of not only the local inhabitants, but also Interexchange Carriers ("IXCs") and their customers because of the improved quality and reliability of access service.[3] These improvements are a result of the small companies being focused entirely on serving the rural areas and with management located in, and responsive to, the local communities.

Although many exchanges have been transferred over the last ten years, the acquisition of a few neighboring rural exchanges by small ILECs has always been difficult for a number of reasons. When the large companies do sell exchanges, they naturally want to sell in large blocks, which requires the small companies to form consortia and to bid against large holding companies at prices well above net book value. When sale contracts are obtained, the Commission's

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[2] RICA Comments, Nov. 3, 2000 3-4, and RICA testimony at *En Banc* Hearing, San Diego, Nov. 13, 2000.

[3] Federal-State Joint Board on Universal Service, *Recommended Decision*, CC Docket 96-45, Dec. 22, 2000, ("Recommended Decision") Statement of Commissioner Bob Rowe, concurred in by Commissioner Laska Schoenfelder, 1. ("Rowe-Schoenfelder Statement") ("[s]mall carriers are investing in fiber backbone, installing ATM switching, and are beginning to deploy high-speed loop").

regulatory approval process has often been long, costly and apparently designed to discourage such acquisitions. Finally, when approval is obtained, complete rebuild of the exchanges is often required, at further expense.

B. Competitive Entry Is Often More Practical Than Purchase in Rural Areas

For many years rural ILECs were unable to respond to the requests to extend their service to their neighbors in BOC service areas because of regulatory restrictions. The removal of these restrictions by the 1996 Amendments to the Communications Act prompted many rural ILECs to establish CLEC operations where the customer demand for improved service was such that very high penetration rates could be expected. These rural CLECs have provided service to both residential and business customers and so have evolved very differently from CLECs in urban areas which have, of economic necessity, focused their attention on high volume business customers.

C. The Joint Board and the Rural Task Force Recognize the Need to Support Investment to Improve Service Quality in Rural America

The Joint Board earlier recognized the disincentive to investment which results from Section 54.305 of the Commission's rules and recommended revision.[4] The Joint Board observed that "by freezing support based on the seller's embedded costs, the rule prevents the acquiring carrier from receiving an amount of support related to the costs of providing supported

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[4] Federal-State Joint Board on Universal Service, *Recommended Decision*, CC Doc. No. 96-45, 15 FCC Rcd 14714, 14723 (2000) ("Phase Down Recommended Decision").

services in the transferred exchanges."[5] The Rural Task Force also addressed this question and recommended a "safety valve" to provide additional support for "meaningful investment" in acquired exchanges.[6] The Separate Statement of Commissioners Rowe and Schoenfelder recognized that the saftey valve "may ameliorate this problem but not eliminate it".[7]

II SUPPORT FOR NEW INVESTMENT IN RURAL AREA SHOULD NOT DISTORT THE "MAKE OR BUY" DECISIONS OF RURAL CARRIERS

A. Support should be equivalent for purchase or overbuild

The Joint Board and the Rural Task Force recommend corrections to the universal service support mechanism which address the question of providing sufficient support when a rural ILEC purchases exchanges from a large carrier, but do not address the parallel issue of the appropriate level of support where the rural ILEC determines that the more prudent approach is to overbuild the large company's exchange in competition with it. As Commissioners Rowe and Schoenfelder correctly point out, providing more support for purchase than for overbuild "may have the unintended effect of increasing the sale price of poor quality plant and thus the overall cost of providing service."[8]

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[5] Id.

[6] Federal-State Joint Board on Universal Service, *Rural Task Force Recommendation to the Federal-State Joint Board on Universal Service,* CC Doc. No. 96-45, Sep. 29, 2000, 29-30 and Appendix D. The Joint Board has identified several implementation issues with regard to this proposal. *Recommended Decision,* 8 at para. 16.

[7] Rowe-Shoenfelder Statement at 5.

[8] Id.

RICA recognizes that there are substantial questions as to the adequacy and implementation of the "safety valve" proposal, and prefers an approach which more resembles the MAG Plan proposal to allow LECs to add lines or exchanges to their study areas upon notification to the Commission. Thus, whatever means the Commission adopts to support rural telephone company improvements should not distort the "make or buy" analysis, but should provide essentially the same support whichever path is taken.[9] Just as the Commission has stated that a purpose of Section 54.305 is to prevent carriers from "placing unreasonable reliance upon potential universal service support in deciding whether to purchase exchanges,"[10] the rules should not encourage purchase when overbuild is the more economically rational decision and will achieve the public policy goals of improving service to the public as well or better.[11]

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[9] Because the "safety-valve" proposal of the RTF does not fully provide support based on the costs of the acquiring company, it is not clear that it will meet the "specific, predictable and sufficient" test of Section 254(b)(5) or the objectives of the Joint Board in the Phase Down Recommended Decision. See Phase Down Recommended Decision, 15 FCC Rcd at 14723.

[10] Federal-State Joint Board on Universal Service, *Thirteenth Report and Order and Further Notice of Proposed Rulemaking,* 15 FCC Rcd 24422, para. 20 (2000)

[11] See, 47 U.S.C. 151 ("[FCC created] to make available, so far as possible, to all the people of the United States, a rapid, efficient, Nation-wide, and world-wide wire and radio communications service with adequate facilities at reasonable charges, ..."); 47 U.S.C. 157(a) ("[t]he Commission....shall encourage the deployment on a reasonable and timely basis of advanced telecommunications capability to all Americans...by utilizing...methods that remove barriers to infrastructure investment"); 47 U.S.C. 254(b)(3) ("[c]onsumers in all regions of the Nation, including low-income consumers and those in rural, insular and high cost areas, should have access to telecommunications and information services, including interexchange services and advanced telecommunications and information services that are reasonably comparable to the services provided in urban areas at rates that are reasonably comparable to rates charged for similar services in urban areas").

B. Modification of the Study Area Freeze to Allow Rural Companies to Include Newly Served Areas Resolves the Administrative Problems with the RTF Proposal and Does Not Distort the "Make/Buy" Decision

When the Commission adopted the Universal Service Fund in 1984 it also froze the boundaries or existing study areas in order to prevent carriers from subdividing their study areas into high and low cost areas.[12] Later, when large companies began selling multiple exchanges to small companies, the Commission addressed the resulting study area boundary change waiver requests as if the large companies were selling high cost exchanges for the sole purpose of finding a means to deaverage their study areas to indirectly obtain high cost support for the high cost portions of their areas. At the urging of AT&T and other IXCs, LECs were required to prove that the result of their acquisition would not cause an annual aggregate shift in USF assistance of one percent or more of the total USF.[13] Whatever the economic validity of this theory, the result was to delay for extended periods the benefits of improved service to thousands of rural Americans. Currently carriers are still required to make this showing.

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[12] MTS and WATS Market Structure, Amendment of Part 67 of the Commission's Rules and Establishment of a Joint Board, *Decision and Order*, 50 Fed.Reg. 939 (1985). See, *Common Carrier Bureau, Request for Clarification Filed by the National Exchange Carrier Association, Inc. and Petitions for Waivers Filed by Alaska Telephone Company, Ducor Telephone Company and Kingsgate Telephone, Inc. Concerning the Definition of "Study Area" Contained in Part 36 Appendix-Glossary of the Commission's Rules: Memorandum Opinion and Order*, 11 FCC Rcd 8156 (1996).

[13] US West Communication, Inc., and Eagle Telecommunications, Inc. Joint Petition for Waiver of the Definition of "Study Area" Contained in Part 36, Appendix-Glossary of the Commission's Rules, *Memorandum Opinion and Order*, 10 FCC Rcd 1771, 1774 (1995). Of course no party could ever make this showing until the year was complete because the total transactions for the year would be unknown until then.

Whatever the continuing validity of the restrictions on subdivision of study areas, the rule, as written, also works to prevent additions to study areas, whether by acquisition or overbuild. Thus not only does a selling company need the Commission's permission to reduce its study area, but the acquiring company needs permission to add the acquired exchanges to its study area. Further, because study areas are considered mutually exclusive geographic areas, a LEC which overbuilds a neighboring LEC cannot consider those lines in its cost study, although it could add lines built to previously unserved customers within it boundaries.

The concept of rigid, mutually exclusive study areas is inconsistent with the deregulatory, pro-competitive approach of the 1996 Act and should be abandoned. Alternatively, the rules should at least be modified to permit additions at the option of the LEC, subject only to a requirement that notice be given to regulators, NECA and USAC. By freely allowing additions to study areas, the additional lines will receive support based upon the total costs of the entity that is actually serving the subscribers. Such support will necessarily be more specific and sufficient than support based upon the per line support received by the seller or the incumbent.

The Commission, the Joint Board and the RTF have all recognized that the support mechanism adopted for non-rural companies is not appropriate for rural companies.[14] It was for this reason that Commission originally determined to establish rural company support on a different time table and with a potentially different mechanism. The RTF has shown, and the Joint Board agreed, that the Commission's synthesis cost model is not a valid predictor of a rural

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[14] Federal-State Joint Board on Universal Service, *Report and Order,* 12 FCC Rcd 8776, 8801-03 (1997)

company's cost.[15]

Even if the model were accurate for rural companies, the use of statewide average methodology may be satisfactory for BOCs which typically serve 90-100% of the subscribers in a state, but is entirely invalid for rural companies serving a few thousand subscribers, whether in their own study area, in an exchange acquired from a BOC, or in a BOC exchange the rural company has overbuilt in competition with the BOC. The result of this mechanism is that most of the high cost BOC areas adjacent to high cost rural company areas do not receive support.[16]

RICA recognizes that this proceeding is not the place to address this anomaly, but does suggest that it need not be extended into the rural company environment. Instead, the support for all rural company lines should be computed on the same basis, whether they are in the original study area, in exchanges acquired from a non-rural company, or were built into the non-rural company's previously monopoly service area. This recognition would minimize or eliminate the various mechanical issues which the Commission has identified. There will be no need to either subjectively or arbitrarily decide how much investment is "meaningful," whether such support should be treated differently under the continuing cap, or whether such support is frozen if the rural company companies' per line support is frozen.

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15 *Recommended Decision* at 7, para. 13.

16 After hold-harmless support is phased out, high cost support, other than interstate access support, will only be available to non-rural companies in Alabama, Maine, Mississippi, Montana, Vermont, West Virginia and Wyoming. Universal Service Administrative Company, *Federal Universal Service Support Mechanism Fund Size Projections and Contributions Base for the Second Quarter 2001*, Feb. 6, 2001, Apps. HC-11, HC-13.

If this proposal is adopted, rural carriers will make investment decisions based on their analysis of the intrinsic economic factors in a given area, without being forced to choose a less desirable alternative because of distortions in the support mechanism.

III CONCLUSION

The Rural Task Force and the Joint Board correctly recognized the public interest benefits in encouraging rural telephone companies to improve service in rural areas served by non-rural companies. It is well established that locally owned and controlled companies provide superior service in rural areas. RICA has proposed minor modifications to the Universal Service recommendation of the Joint Board and the Rural Task Force in order to encourage the Commission to adopt rules which do not distort the analysis of whether such service improvements are more economically accomplished by purchasing exchanges or overbuilding them as a competitive carrier. If the Commission adopts the "safety valve" proposal of the Rural Task Force, it should be applicable whether the carrier purchases or overbuilds the area. Among alternatives to accomplish this result, a straightforward method is to modify the study area freeze rules to allow carriers to freely add lines or exchanges to existing study areas. This change would not preclude retention of the rule against subdivision of study areas without Commission permission.

Respectfully submitted

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February 26, 2001

CERTIFICATE OF SERVICE

I, Nancy Wilbourn, of Kraskin, Lesse & Cosson, LLP, 2120 L Street, NW, Suite 520, Washington, DC 20037, do hereby certify that a copy of the foregoing "Comments of the Rural Independent Competitive Alliance" was served on this 26th day of February 2001, by first class, U.S. Mail, postage prepaid to the following parties:

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